

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

DEQUE SYSTEMS INC.

Plaintiff,

v.

**BROWSERSTACK, INC., and
BROWSERSTACK LIMITED, and
BROWSERSTACK SOFTWARE PVT.
LTD.,**

Case No. 1:24-cv-00217-AJT-WEF

Defendants.

DEFENDANT BROWSERSTACK, INC.’S MOTION TO DISMISS
PURSUANT TO RULE 12(B)(6)

Defendant BrowserStack, Inc. (“Defendant” or “BrowserStack U.S.”), by counsel, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, respectfully moves to dismiss the Complaint [ECF No. 1] filed by Plaintiff Deque Systems Inc. (“Deque” or “Plaintiff”) in its entirety due to Plaintiff’s failure to state a claim for which relief can be granted. The grounds for this motion are fully detailed in the Memorandum in Support that is filed contemporaneously herewith.

WHEREFORE, BrowserStack, Inc. respectfully requests that the Court grant this motion and dismiss Plaintiff’s Complaint with prejudice.

Dated: April 8, 2024.

Respectfully submitted,

/s/ Belinda D. Jones

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Songmee L. Connolly (*pro hac vice* application
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Attorneys for Defendant BrowserStack, Inc.

CERTIFICATE OF SERVICE

I certify that on April 8, 2024, I filed a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ Belinda D. Jones
Counsel

Attorneys for Defendant BrowserStack, Inc.